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Attorneys for Plaintiffs

BRIGHTHOUSE LIFE INSURANCE COMPANY,
METROPOLITAN LIFE INSURANCE COMPANY,
and METLIFE REAL ESTATE LENDING, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

Plaintiff,

v.

ACDF, LLC, a California limited liability
company, *et al.*,

Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:

1:24-cv-01226; 1:24-cv-01230;
1:24-cv-01231; 1:24-cv-01232;
1:24-cv-01233; 1:24-cv-01235; and
1:24-cv-01241

**STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER**

Date: February 2, 2026

Time: 1:30 p.m.

Judge: Hon. Stanley A. Boone

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- ☒ Affects All Cases
☐ Affects Metropolitan Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01261
☐ Affects Metropolitan Life Ins. Co. v. FNF
Farms, LLC, et al., 1:24-cv-01226
☐ Affects Metropolitan Life Ins. Co. v. C & A
Farms, LLC, et al., 1:24-cv-01230
☐ Affects Metropolitan Life Ins. Co. v.
Maricopa Orchards, LLC, et al., 1:24-cv-
01231
☐ Affects Brighthouse Life Ins. Co. v. Kamm
South, LLC, et al., 1:24-cv-01232
☐ Affects Brighthouse Life Ins. Co. v.
Manning Avenue Pistachios, LLC, et al.,
1:24-cv-01233 Case No. 1:24-cv-01233
☐ Affects Brighthouse Life Ins. Co. v. ACDF,
LLC, et al., 1:24-cv-01235
☐ Affects MetLife Real Estate Lending, LLC
v. Panoche Pistachios, LLC, et al., 1:24-cv-
01241

STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

1 TO THE HONORABLE STANLEY A. BOONE, U.S. MAGISTRATE JUDGE:

2 IT IS HEREBY STIPULATED by and between Plaintiffs Brighthouse Life Insurance
3 Company, Metropolitan Life Insurance Company, and MetLife Real Estate ending, LLC and
4 Prudential Insurance Company of America (collectively, “Plaintiffs”)¹ and Defendants² (together
5 with Plaintiffs, the “Parties”) through their respective counsel, that the Scheduling Conference
6 currently set for February 2, 2026 be continued 90-days to May 4, 2026 at 1:30 p.m.

7 The Parties respectfully request a 90-day continuance of the Initial Scheduling Conference
8 (to May 4, 2026). Sales of real property are in progress or have occurred. On December 28, 2025,
9 the Court approved Prudential Insurance Company of America’s substitution as the Plaintiff in the
10 Maricopa matter (Dkt. No. 40 in *Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al.*,
11 1:24-cv-01231). Counsel for Prudential has also informed the parties that Prudential intends to
12 substitute in as Plaintiff in the following matters: 1:24-cv-01261-KES-SAB; 1:24-cv-01235-KES-
13 SAB; 1:24-cv-01226-KES-SAB; and 1:24-cv-01232-KES-SAB.

14 These developments are expected to significantly narrow the scope of the discovery plan
15 and the issues to be addressed at the Initial Scheduling Conference. Given the complexity of these
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18 ¹ *Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al.*, 1:24-cv-01226; *Metropolitan Life Ins. Co.*
19 *v. C & A Farms, LLC, et al.*, 1:24-cv-01230; *Metropolitan Life Ins. Co. v. Maricopa Orchards,*
20 *LLC, et al.*, 1:24-cv-01231; *Brighthouse Life Ins. Co. v. Kamm South, LLC, et al.*, 1:24-cv-01232;
21 *Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al.*, 1:24-cv-01233; *Brighthouse*
22 *Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-01235; *MetLife Real Estate Lending, LLC v. Panoche*
23 *Pistachios, LLC, et al.*, 1:24-cv-01241; *Metropolitan Life Ins. Co. v. ACDF, LLC, et al.*, 1:24-cv-
24 01261.

25 ² Defendants Maricopa Orchards, LLC; ACDF, LLC, as successor by merger to 104 Partners, LLC;
26 Willow Avenue Investments, LLC; Ashlan & Hayes Investments, LLC; Grantor Fresno Clovis
27 Investments, LLC; Maricopa Orchards, LLC; Manning Avenue Pistachios, LLC; C & A Farms,
28 LLC; Cantua Orchards, LLC; FNF Farms, LLC; Panoche Pistachios, LLC; Kamm South, LLC;
Donald E. Schramm and Nada L. Schramm Revocable Trust Dated 12/2/2010; The Thomsen
Family Trust Dated 11/24/2010; Daniel L. Sweet, an individual; Carole A. Sweet, an individual;
Donald E. Schramm, an individual; Nada L. Schramm, an individual; Keith A. Thomsen, an
individual; the testate and intestate successors of Catherine S. Thomsen, deceased, and all persons
claiming by, through or under such decedent; Farid Assemi, an individual; Farshid Assemi, an
individual; and Darius Assemi, an individual (collectively, the “Defendants”). As of the time of
this filing, counsel for Plaintiffs did not receive a response or signature authorization from counsel
for Dumar, LLC and Pistache, LLC.

multi-party proceedings, the Parties request additional time to meet and confer on a discovery plan, case schedule, and the matters at issue in the various cases.

IT IS SO STIPULATED.

DATED: January 9, 2026

STOEL RIVES LLP

/s/ Michelle J. Rosales

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Attorneys for Plaintiffs

BRIGHTHOUSE LIFE INSURANCE

COMPANY, METROPOLITAN LIFE

INSURANCE COMPANY, and METLIFE

REAL ESTATE LENDING, LLC

DATED: January 9, 2026

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PRUDENTIAL INSURANCE COMPANY OF

AMERICA

STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

151637479.2 0053564-00653

1 DATED: January 12, 2026

WANGER JONES HELSEY PC

2
3 /s/ Ian J. Quinn

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7 *Attorneys for Defendants*

ACDF, LLC; C&A FARMS, LLC; CANTUA

8 ORCHARDS, LLC; FNF FARMS, LLC;

KAMM SOUTH, LLC; MARICOPA

9 ORCHARDS, LLC; ASHLAN & HAYES

INVESTMENTS, LLC; PANOCHÉ

10 PISTACHIOS, LLC; WILLOW AVENUE

INVESTMENTS, LLC; MANNING AVENUE

11 PISTACHIOS, LLC; GRANTOR FRESNO

CLOVIS INVESTMENTS, LLC

12 DATED: January 9, 2026

LEVENE, NEALE, BENDER, YOO &
13 GOLUBCHIK LLP

14 /s/ Richard D. Steelman, Jr.

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16 RICHARD D. STEELMAN, JR., Bar No.

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17 *Attorneys for Defendants*

18 FARID ASSEMI, an individual, and FARSHID

ASSEMI, an individual.

19 DATED: January 10, 2026

MOJDEHI GALVIN REGO LLP

20
21 /s/ Ali M. Mojdehi

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22 ali.mojdehi@mgr-legal.com

23 *Attorneys for Defendants*

DARIUS ASSEMI, an individual

24
25
26
27
28
STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

151637479.2 0053564-00653

1 DATED: January 12, 2026

BAKER MANOCK & JENSEN, PC

2 /s/ Dirk B. Paloutzian

3 DIRK B. PALOUTZIAN, Bar No. 173676
4 dpaloutzian@bakermanock.com

5 *Attorneys for Defendants*

6 DONALD E. SCHRAMM AND NADA L.
7 SCHRAMM REVOCABLE TRUST DATED
8 12/2/2010; THE THOMSEN FAMILY TRUST
9 DATED 11/24/2010; DANIEL L. SWEET, AN
10 INDIVIDUAL; CAROLE A. SWEET, AN
11 INDIVIDUAL; DONALD E. SCHRAMM, AN
12 INDIVIDUAL; NADA L. SCHRAMM, AN
13 INDIVIDUAL; KEITH A. THOMSEN, AN
14 INDIVIDUAL; THE TESTATE AND
15 INTESATE SUCCESSORS OF
16 CATHERINE S. THOMSEN, DECEASED,
17 AND ALL PERSONS CLAIMING BY,
18 THROUGH OR UNDER SUCH DECEDENT

19 **ATTESTATION UNDER L.R. 131(c)**

20 Pursuant to Civil Local Rule 131(c), I attest under the penalty of perjury that the above
21 signatories authorized the use of an electronic signature and concurred in the filing of this
22 document.
23

24 DATED: January 12, 2026

/s/ Michelle J. Rosales

25 MICHELLE J. ROSALES
26
27
28

STOEL RIVES LLP
ATTORNEYS AT LAW
SACRAMENTO
STIPULATION TO CONTINUE
SCHEDULING CONFERENCE;
[PROPOSED] ORDER

151637479.2 0053564-00653

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the Scheduling Conference currently set for February 2, 2026, at 1:30 p.m. shall be continued to May 4, 2026, at 1:30 a.m. in Courtroom 9 before the Honorable Magistrate Judge Stanley A. Boone.

IT IS SO ORDERED.

Dated: _____

UNITED STATES MAGISTRATE JUDGE